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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNY LISETTE FLORES, *et al.*,

Plaintiffs,

- VS -

WILLIAM P. BARR, Attorney  
General of the United States, *et al.*,

Defendants.

) Case No. CV 85-4544 DMG (AGR<sup>x</sup>)<sup>[L]</sup><sub>SEP</sub>  
)  
) [UNDER SEAL] SUPPLEMENTAL  
) DECLARATION OF CLASS COUNSEL IN  
) SUPPORT OF SUPPLEMENTAL  
) APPLICATION FOR LEAVE TO FILE  
) CORRECTED POINTS AND AUTHORITIES  
) IN SUPPORT OF MOTION TO ENFORCE  
) SETTLEMENT AND EXHIBIT 10 UNDER  
) SEAL.

[HON. DOLLY M. GEE]

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SUPPLEMENTAL DECLARATION OF PETER SCHEY

I, Peter A. Schey, depose and say:

1. This declaration is made in support of the concurrently filed Supplemental Application for Leave to File Corrected Memorandum of Points and Authorities in Support of Motion to Enforce Settlement and Exhibit 10 Under Seal.

2. On May 31, 2019, Plaintiffs filed a Notice of Motion and Motion to Enforce Settlement Agreement; Memorandum of Points and Authorities [Doc. #547-2], and five volumes of Exhibits in Support of Plaintiffs' Motion to Enforce the Settlement [Redacted Version of Document Proposed to be Filed Under Seal] [Doc. ## 547-3, 547-4, 547-5, 547-6, and 547-7]. Plaintiffs concurrently filed an Application to File Motion to Enforce Settlement and Exhibits Under Seal [Doc. # 547], and a Declaration in Support of Application to file Motion to Enforce Settlement and Exhibits under seal [Doc. #548].

3. Subsequently, on May 31, 2019, this Court issued a Minute Order [Doc. # 549] instructing Plaintiffs to file a Supplemental Application explaining proposed redactions in Exhibit 10 (Volume 2) [Doc. # 547-4], which is a deposition taken in *Lucas R. v. Alex Azar*, 2:18-CV-05741 (CD Cal.), and to provide Defendants' position as to those redactions.

1 4. On May 31, 2019, I corresponded with Sarah Fabian, counsel for Defendants  
2 in *Flores*, to ask the government's position as to redactions in Exhibit 10. Ms. Fabian  
3 forwarded my correspondence to counsel for Defendants in *Lucas R.*, Benjamin Moss.  
4 On June 4, 2019, Mr. Moss replied to me with the government's position as to the use  
5 of the deposition and the proposed redactions, which stated:

6  
7 The Court's May 31, 2019 order in *Flores* pertaining to "information  
8 concerning the 'identities of certain Government employees' is covered  
9 under paragraph 5 of the *Lucas R.* protective order, which defines  
10 'Confidential Personal Information' as 'personal identifiable information'  
11 for 'third parties, non-supervisory federal and non-federal employees,  
12 including names and contact information. We also note that the official-  
13 capacity *Lucas R.* defendants proceeded with the April 2019 depositions of  
14 [government employee deponents] in good faith under the auspices of the  
15 *Lucas R.* case based on our understanding that these depositions would be  
16 used solely for purposes of the *Lucas R.* litigation. Indeed Paragraph 12 of  
17 the *Lucas R.* protective order provides that "all Confidential Personal  
18 Information produced or exchanged pursuant to this Protective Order ***shall***  
19 ***be used solely for the purposes of litigating or resolving this action and for***  
20 ***no other purpose whatsoever*** and shall not be disclosed, disseminated, or  
21 transmitted to any person, entity, or organization except in accordance with  
22 the terms of this Protective Order." (emphasis added). Using evidence  
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1 collected in *Lucas R.* that the *Flores* plaintiffs would not otherwise be  
2 entitled to obtain under *Flores* does not comport with the spirit or the letter  
3 of the *Lucas R.* protective order. We therefore and respectfully object to the  
4 *Flores* plaintiffs' proposal to use that evidence outside of the *Lucas R.* case  
5 in general and in *Flores* in particular.  
6

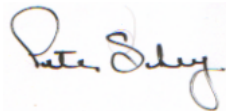
7  
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9 If, however, the Court concludes that using evidence collected in and subject  
10 to the protective order in *Lucas R.* is nevertheless appropriate in *Flores*, the  
11 *Lucas R.* official-capacity defendants state as follows concerning what  
12 redactions may be required under the *Lucas R.* protective order. Under the  
13 *Lucas R.* protective order, concerning: (1) [Deponent]: Her name and title  
14 should be redacted under the *Lucas R.* protective order, as she is not a  
15 supervisory employee. (2) Jill Volovar and James de la Cruz: As we  
16 understand these employees to have supervisory duties, we do not read the  
17 *Lucas R.* protective order as requiring redaction. (3) [Six names of  
18 employees] and any other federal employees or contractors referenced in  
19 [Deponent's] deposition: their names and titles should be redacted under the  
20 *Lucas R.* protective order, as upon our initial understanding these people are  
21 either non-supervisory federal or non-federal employees....  
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1           5. A true and correct copy of the Stipulated Protective Order filed in *Lucas R.* is  
2 attached hereto as Exhibit 1.

3           6. Plaintiffs do not have sufficient information to assess whether the six named  
4 employees and the deponent in Exhibit 10 are supervisory or non-supervisory  
5 employees. Since the pages on which the non-deponent employees are mentioned are  
6 irrelevant to the pending motion, Plaintiffs have extracted from Exhibit 10 pages 11,  
7 17, 19, 58, 123, 169, and 183, containing the names of employees Defendants assert  
8 are non-supervisory employees. The only redactions remaining in Exhibit 10 are the  
9 deponent's name and title. The deponent's name and title are also redacted from the  
10 concurrently filed Corrected Points and Authorities in Support of Motion to Enforce  
11 Settlement Agreement.  
12

13           I declare under penalty of the perjury that the foregoing facts are true and  
14 correct. Executed this 14th day of June, 2019, in Los Angeles, California.  
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Peter A. Schey

# Exhibit 1

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

LUCAS R., et al.,

Plaintiffs,

v.

ALEX AZAR, Secretary of U.S.  
Department of Health and Human  
Services, et al.,

Defendants.

Case No. 2:18-CV-05741 DMG PLA

**STIPULATED PROTECTIVE  
ORDER**



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28 *Attorneys for Defendant E. Scott Lloyd*

**GENERAL**

1  
2           **1.**     Purposes and Limitations. On September 7, 2018, Plaintiffs filed a First  
3 Amended Complaint against Defendants (Plaintiffs collectively with Defendants, the  
4 “Parties”). The Parties are presently conducting discovery concerning both Named  
5 Plaintiffs, who were minors in the custody of the Office of Refugee Resettlement  
6 (“ORR”), and current class members in this action, who are minors in the custody of  
7 ORR. The Parties respectfully request that the Court enter a Protective Order  
8 governing the production, disclosure, and dissemination of confidential, personally  
9 identifiable information.

10           **2.**     Good Cause Statement. Good cause exists for the entry of this  
11 Protective Order because some discovery granted, ordered, or provided in this action  
12 is likely to result in the disclosure by the Parties of personal, confidential, or medical  
13 information of individuals, including minors, who are or were in the custody of ORR,  
14 and of third parties. The Court, having found that good cause exists for entry of an  
15 appropriately-tailored confidentiality order governing discovery in this action,  
16 HEREBY ORDERS:

17           **3.**     This Protective Order and the terms, obligations, and responsibilities of  
18 the Parties contained herein shall govern all personally identifiable information  
19 disclosed or produced as a result of discovery granted, ordered, or provided in this  
20 action.

21           **4.**     Pursuant to 5 U.S.C. § 552a (the “Privacy Act”), this Protective Order  
22 authorizes the parties to (1) produce personally identifiable information that would  
23 otherwise be prohibited from disclosure under the Privacy Act, (2) produce  
24 personally identifiable information without presenting Privacy Act objections to this  
25 Court for a decision regarding such disclosure, and (3) produce information protected  
26 under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”).  
27 To the extent the Privacy Act or HIPAA allows the disclosure of information  
28 pursuant to a court order, this Protective Order constitutes such a court order, and

1 authorizes the disclosure of that information. Notwithstanding the entry of this  
2 Protective Order, nothing in this paragraph shall require production of information  
3 that is prohibited from disclosure (even with the entry of this Protective Order) by  
4 other applicable privileges, statutes, regulations, or authorities by which Defendants  
5 may be bound. This Protective Order shall also govern the safeguarding of such  
6 information by all individuals referenced herein.

7       **5.** As used in this Protective Order, the term “Confidential Personal  
8 Information” includes personally identifiable information or medical information of  
9 individuals who are or were in the custody of ORR, third parties, non-supervisory  
10 federal and non-federal employees, including names and contact information;  
11 confidential commercial or financial information as defined under 5 U.S.C. §  
12 552(b)(4); and any other information that is protected or restricted from disclosure  
13 by statute or regulation, but which the Court may order to be produced. If a  
14 designating Party determines that information not described in this paragraph should  
15 be designated Confidential Personal Information, the Parties shall negotiate the  
16 appropriateness of that designation in good faith and endeavor to resolve any dispute  
17 prior to the production of that information.

18       **6.** Confidential Personal Information may be designated by the Parties in  
19 one or more of the following ways:

20           **a.** Any and all Confidential Personal Information contained in  
21 documents produced by Defendants to Plaintiffs as a result of discovery governed by  
22 this Protective Order shall be designated “Defendants’ Confidential Personal  
23 Information.”

24           **b.** Any and all Confidential Personal Information produced by  
25 Plaintiffs to Defendants as a result of discovery governed by this Protective Order  
26 shall be designated “Plaintiffs’ Confidential Personal Information.”

27           **c.** Confidential Personal Information may be so designated by the  
28 Parties simply by inserting the word “Confidential” in a conspicuous place on any

documents produced as a result of discovery governed by this Protective Order. Confidential Personal Information contained in any statement made during an oral deposition may be designated as “Confidential” either through a statement made on the record, or by serving written notice of the page and line of the confidential deposition portions. If a Party orally designates testimony as “Confidential” during the course of a deposition by making a statement to that effect on the record, the court reporter shall transcribe the designated pages in a separate volume marked with the appropriate designation. Any individual attending the deposition must leave the room prior to discussion of whether material is designable if that person is not authorized to view Confidential Personal Information under the terms of this Protective Order. If such designations are made through written notice, they shall be made within twenty (20) days of receiving the final transcript. Until the aforesaid period to designate the deposition has passed, the entire transcript shall be deemed Confidential Personal Information under the terms of this Protective Order.

**d.** If a Party disagrees with a designation of Confidential Personal Information, it shall provide the designating Party written notice of its challenge. The challenging Party and the designating Party shall attempt to resolve each challenge in good faith and must begin a meet and confer process under Local Rule 37-1, et. seq., or under procedures otherwise laid out by the Court. If the Parties cannot resolve this dispute, they may proceed under the Federal and Local Rules of Civil Procedure addressing discovery disputes. The designating Party bears the burden of showing that information is “Confidential Personal Information” as defined herein. Failure to challenge a designation immediately does not waive a Party’s ability to bring a later challenge. Frivolous challenges to a designation, and those made for an improper purpose (e.g., to harass or to impose unnecessary expenses and burdens on other parties), may expose the challenging Party to sanctions.

**e.** Information designated as Confidential Personal Information, including the portion of any document containing Confidential Personal Information,

1 may be disclosed only to the following “Qualified Persons”:

2 (1) Defendants’ Counsel in this action and any employed or  
3 contracted support staff and other contractors or employees of such counsel or  
4 Defendants assisting in this action with an appropriate need to know, including  
5 litigation assistants, paralegals, information technology, information or records  
6 management, investigative, secretarial, or clerical personnel;

7 (2) Plaintiffs’ Counsel in this action and any employed or  
8 contracted support staff and other contractors or employees of such counsel assisting  
9 in this action with an appropriate need to know, including litigation assistants,  
10 paralegals, information technology, information or records management,  
11 investigative, secretarial, or clerical personnel;

12 (3) Any experts retained for this action by counsel to a Party  
13 or support staff or employees for such an expert with an appropriate need to know;

14 (4) Any other person mutually authorized by the Parties’  
15 counsel to examine such information with an appropriate need to know;

16 (5) Potential percipient witnesses with an appropriate need to  
17 know; and

18 (6) The Court and its personnel, including court reporters.

19 f. All persons listed in subparagraphs 6(e)(3)-(5) to whom  
20 Confidential Personal Information is disclosed shall first be required to read the  
21 terms of this Protective Order and sign a copy of the “Acknowledgment of Protective  
22 Order for Discovery” form, attached hereto as Exhibit A. This requirement does not  
23 apply to the disclosure of Confidential Personal Information to the Court and its  
24 personnel, including court reporters.

25 7. Nothing in this Protective Order shall limit or in any way restrict  
26 Department of Health and Human Services and Department of Justice Counsel from  
27 discussing the cases of individuals whose Confidential Personal Information is  
28 protected by this Protective Order in order to carry out their operations and

1 proceedings. Nothing in this Protective Order shall limit or in any way restrict the  
2 Parties' use of information obtained through a source other than through discovery  
3 production. Further, nothing in this Protective Order shall restrict Defendants from  
4 performing statutorily authorized functions as they pertain to such individuals, and  
5 Defendants may not be held liable for fully executing such authority in ordinary  
6 course, notwithstanding this Protective Order.

7 **8.** All discovery labeled Confidential Personal Information shall be  
8 disclosed or made available only to Qualified Persons and shall be restricted in  
9 circulation only to said Qualified Persons.

10 **9.** All Qualified Persons to whom Confidential Personal Information is  
11 disclosed are hereby prohibited from disclosing to, or otherwise discussing with, any  
12 person other than other Qualified Persons, any information designated as  
13 Confidential Personal Information, except as otherwise provided in this Protective  
14 Order.

15 **10.** In the event a Party wishes to use any Confidential Personal Information  
16 produced under this Protective Order to move the Court to resolve a matter arising  
17 from litigating this action only, or to oppose such motion, such pleadings shall be  
18 filed in accordance with Local Rule 79-5. Confidential Personal Information may  
19 only be filed under seal pursuant to a court order authorizing the sealing of the  
20 specific Confidential Personal Information at issue; good cause must be shown in the  
21 request to file under seal. If a Party's request to file Confidential Personal  
22 Information under seal is denied by the Court, then the receiving Party may file the  
23 information in the public record unless otherwise instructed by the Court.

24 **11.** If counsel for any Party is required by law or court order to disclose,  
25 disseminate, or transmit Confidential Personal Information produced under this  
26 Protective Order to any person or entity not identified herein as a Qualified Person,  
27 the name of that person or entity and the reason access is required shall be provided  
28 to counsel for the Parties no less than fourteen (14) days prior to disclosure,

1 dissemination, or transmittal, so as to provide the designating Party sufficient time to  
2 object and seek a protective order as necessary. There shall be no disclosure after an  
3 objection has been made until the dispute has been resolved unless disclosure,  
4 dissemination, or transmission is required by law or a court order. Any person, entity,  
5 or organization who receives Confidential Personal Information shall be provided  
6 with a photocopy of this Protective Order, shall sign a copy of the Acknowledgment  
7 of Protective Order for Discovery form, and shall abide by all the terms and  
8 conditions set forth herein unless otherwise permitted by a court order.

9       **12.** Except as provided in this paragraph or elsewhere in this Protective  
10 Order, all Confidential Personal Information produced or exchanged pursuant to this  
11 Protective Order shall be used solely for the purposes of litigating or resolving this  
12 action and for no other purpose whatsoever and shall not be disclosed, disseminated,  
13 or transmitted to any person, entity, or organization except in accordance with the  
14 terms of this Protective Order.

15               **a.** The limitations and restrictions on Confidential Personal  
16 Information in this Protective Order shall not apply with respect to information  
17 obtained through a source other than through the instant litigation.

18               **b.** This Protective Order shall not preclude Plaintiffs' Counsel from  
19 using the information obtained through discovery production to contact class  
20 members as certified by the Court for purposes of this case and as provided for  
21 pursuant to the procedures laid out in the parties' Rule 26(f) report.

22       **13.** The Parties shall maintain Confidential Personal Information as follows:

23               **a.** The Parties and anyone to whom Confidential Personal  
24 Information has been disclosed in accordance with paragraph 6 shall maintain  
25 Confidential Personal Information pursuant to the terms of this Protective Order,  
26 subject to further order by this Court (this provision does not apply to Confidential  
27 Personal Information disclosed to and maintained by the Court and its personnel,  
28 including court reporters). Within ten (10) days after the final disposition of this



1 action, including any and all appeals, all Confidential Personal Information and  
2 copies thereof in the possession of the Parties and anyone to whom Confidential  
3 Personal Information has been disclosed in accordance with paragraph 6, shall be  
4 returned to the producing Party or destroyed, at the option of the producing Party,  
5 except as this Court may otherwise order. If destroyed, it shall be certified in writing  
6 to the producing Party that such information has been destroyed.

7           **b.** Notwithstanding subparagraph 13(a), counsel of record may  
8 maintain a complete set of discovery for their records through the final disposition of  
9 this action, including any and all appeals or the time during which an appeal is  
10 possible, and for a period of eight (8) years after resolution of the case or after any  
11 judgment becomes final, whichever is later, provided that such counsel maintain the  
12 confidential nature of the discovery, as set forth in this Protective Order. In  
13 particular, attorneys for the United States may maintain copies of any documents  
14 designated Confidential in their case file for this case, and may maintain copies of  
15 any notes or summaries containing such Confidential material in their case file for  
16 this case, subject to 44 U.S.C. § 3101, *et seq.*, and 5 U.S.C. § 552, *et seq.*

17           **14.** If a Party inadvertently fails to designate material as Confidential  
18 Personal Information at the time of production, it shall take reasonable steps to notify  
19 the receiving Party of its failure within five (5) business days of discovery of the  
20 inadvertent failure to designate. The designating Party shall promptly supply the  
21 receiving Party with new copies of any documents bearing corrected confidentiality  
22 designations, and the receiving Party shall return or destroy the original materials,  
23 and certify in writing to the designating Party that such information has been  
24 destroyed.

25           **15.** Under Federal Rule of Evidence 502, inadvertent disclosure of any  
26 document or information during discovery in this action shall be without prejudice to  
27 any claims that such material is confidential, privileged, or otherwise protected from  
28 discovery within the meaning of Federal Rule of Civil Procedure 26, and no Party to



1 this Protective Order shall be held to have waived any rights by such inadvertent  
2 disclosure. Except in the event that the receiving Party disputes the claim, any  
3 documents the producing Party deems to have been inadvertently disclosed shall be,  
4 within five (5) business days, returned or destroyed, and the receiving Party shall  
5 provide a written certification of counsel that all such disclosed information has been  
6 returned or destroyed. If a claim is disputed, the Parties shall follow the procedures  
7 outlined in the Federal and Local Rules of Civil Procedure and the Court's standing  
8 orders. Further, any document or information so produced or disclosed, and subject  
9 to any subsequent claim of privilege, work-product or any other protection, including  
10 protection under this Protective Order, shall not be introduced into evidence in this  
11 or any other proceeding by any person without either: (1) the consent of the producing  
12 Party or (2) order of this Court. Nor will such document or information be subject to  
13 production (other than in camera) in any proceeding by virtue of the fact that it was  
14 produced in this proceeding.

15 **16.** Nothing in this Protective Order shall be construed as a waiver of any  
16 defense, right or claim by either Party, nor shall this Protective Order affect the right  
17 of either Party to seek additional protection against the disclosure of any information,  
18 documents or materials, or of the Parties to seek additional disclosures.

19 **17.** Nothing in this Protective Order shall be taken to authorize disclosure  
20 of information barred from disclosure pursuant to Local Rule 79-5.

21 **18.** Nothing in this Protective Order shall prevent disclosure of otherwise  
22 protected Confidential Personal Information if the person to whom the Confidential  
23 Personal Information pertains, and counsel for all Parties, consents to such disclosure  
24 in writing, or if the Court, after notice to the Parties, orders such disclosure.  
25 Disclosure shall be limited to the extent to which it is authorized by such person or a  
26 Court Order.

27 **19.** Nothing in this Protective Order prohibits either Party from sharing with  
28 the Court information concerning anyone named as a result of this discovery,

1 provided such information is filed pursuant to the rules herein governing the filing of  
2 Confidential Personal Information.

3       **20.** The Parties may seek to modify this Protective Order through a written  
4 agreement signed by counsel for all Parties and approved by the Court. In the event  
5 that all Parties do not agree to a proposed modification, each Party reserves the right  
6 to seek leave of the Court to modify this Protective Order.

7       **21.** This Protective Order shall be binding upon any present or future party  
8 to the *Lucas R. et al., v. Azar, et al.*, No. 2-18-CV-05741-DMG (C.D. Cal.), litigation  
9 as it relates to the production of information as a result of discovery governed by this  
10 Protective Order.

11       **22.** The terms of this Protective Order shall survive the termination of the  
12 above-captioned proceeding after its final disposition for purposes of enforcing this  
13 Protective Order.

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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1 Dated: March 12, 2019

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15 Dated: March 12, 2019

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20 DAVID PINCHAS

21  
22 By: /s/ W. Daniel Shieh

23 W. Daniel Shieh

24 *Attorneys for Defendants (Official  
Capacity Only)*

1 Dated: March 12, 2019

NICOLA T. HANNA  
DAVID M. HARRIS  
JOANNE S. OSINOFF  
DAVID PINCHAS

2  
3  
4  
5 By: /s/ David Pinchas

David Pinchas

6 *Attorneys for Defendant E. Scott Lloyd*

7 Pursuant to Local Rule 5-4.3.4(i),  
8 I certify that all of the above  
9 signatories concur in this filing's  
10 content and have authorized the  
11 filing.

COOLEY LLP

12 By: /s/ Jon F. Cieslak

Jon F. Cieslak

13 *Attorneys for Plaintiffs*

14 Dated: March 12, 2019

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8  
9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION  
12

13 LUCAS R., et al.,

14 Plaintiffs,

15 v.

16 ALEX AZAR, Secretary of U.S.  
17 Department of Health and Human  
Services, et al.,

18 Defendants.  
19

Case No. 2:18-CV-05741 DMG PLA

**[PROPOSED] STIPULATED  
PROTECTIVE ORDER**

20 Having considered the papers, and finding that good cause exists, the Court  
21 hereby enters the Parties' Stipulated Protective Order.  
22

23  
24 IT IS SO ORDERED.  
25

26 DATED: March \_\_\_\_, 2019

27 \_\_\_\_\_  
PAUL L. ABRAMS  
United States Magistrate Judge  
28

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

LUCAS R., et al.,

Plaintiffs,

v.

ALEX AZAR, Secretary of U.S.  
Department of Health and Human  
Services, et al.,

Defendants.

Case No. 2:18-CV-05741 DMG PLA

**[PROPOSED] STIPULATED  
PROTECTIVE ORDER**

**ACKNOWLEDGMENT**

I \_\_\_\_\_, am aware of the litigation in *Lucas R. et al., v. Azar, et al.*, No. 2-18-CV-05741-DMG (C.D. Cal.) in the capacity of \_\_\_\_\_. I do solemnly swear or aver that I am fully familiar with the terms of the Stipulated Protective Order (“Protective Order”) in the above referenced matter on \_\_\_\_\_, and hereby agree to comply with and be bound by its terms and conditions unless and until it is modified by further Order of the United States District Court for the Central District of California (“Court”). I also acknowledge that I have reviewed the provisions of the Protective Order governing “Confidential Personal Information”, and understand that this information, which may include personally identifiable information, confidential commercial or financial information, or medical information, may be disclosed to me. I understand that such information shall not be disclosed, disseminated, or distributed to any person who is not authorized to receive it in accordance with paragraph 6 of the Protective Order. For these reasons, I specifically acknowledge consent and agree to

1 the disclosure requirements, limits and restrictions of the Protective Order and hereby  
2 consent  
3 to the jurisdiction of the Court for purposes of enforcing this Order.

4  
5 Executed this \_\_\_\_ day of \_\_\_\_\_ by \_\_\_\_\_  
6 (Print Name)

7 Signed \_\_\_\_\_

8 200364638 v1

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On June 14 2019, I electronically filed the following document(s):

UNDER SEAL SUPPLEMENTAL DECLARATION OF CLASS COUNSEL IN SUPPORT OF SUPPLEMENTAL APPLICATION FOR LEAVE TO FILE CORRECTED POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO ENFORCE SETTLEMENT AND EXHIBIT 10 UNDER SEAL.

with the United States District Court, Central District of California by using the CM/ECF system.

/s/ Peter Schey  
*Attorney for Plaintiffs*